IN THE UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF FLORIDA FORT MYERS DIVISION

LINDA FAIRSTEIN,)
Plaintiff,) Case No: 2:20-cv-00180-TPB-NPM
v.)
NETFLIX, INC., AVA DUVERNAY, and ATTICA LOCKE,)))
Defendants.)))

DECLARATION OF CHAD LEONARD

- I, Chad Leonard, declare as follows:
- I am the manager of the Vero Beach Book Center located at 392 21st St., Vero Beach, Florida 32960.
- Although Linda Fairstein's novels were formerly sold at the Vero Beach Book
 Center, the bookstore does not currently have any new copies of Ms. Fairstein's books available
 for sale.
- 3. If a customer were to request to purchase one of Ms. Fairstein's novels published by Penguin Random House, I am unable to order the book from either the publisher, Penguin Random House, or our national book distributor, Ingram, because the publisher no longer makes the books available for sale.
- 4. Thus, I am unable to sell new copies of Linda Fairstein's novels published by Penguin Random House at the Vero Beach Book Center.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Executed on this _____ day of June, 2020.

CHAD LEONARD